

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
BALTIMORE**

**UNITED STATES**

**v.**

**GARY CREEK**

**Defendant.**

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**Case No. 1:19Cr00036-CCB-17**

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Gary Creek, through counsel, respectfully moves the Court for leave to file a supplement to the motion to suppress fruits of the search of 1315 Homestead St. ECF 490. Mr. Creek asks this Court to allow him to file this supplement by no later than October 15, 2020. In support of his motion, Mr. Creek states as follows:

1. The government provided defense counsel with the state warrant for this search, for the first time, on September 23, 2020.
2. Previously, undersigned counsel did not have a copy of the warrant and therefore could not raise specific suppression issues. Undersigned counsel filed a general motion to preserve Mr. Creek's rights.
3. In the supplement, undersigned counsel intends to provide more detailed factual and legal grounds for suppression.

WHEREFORE, for all of the foregoing reasons, Mr. Creek respectfully asks this Court to allow him to file a supplement to ECF 490 by no later than October 15, 2020.

Respectfully Submitted,

By: /s/ Eugene V. Gorokhov  
Eugene Gorokhov,  
D. Md. Bar. 07233

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## **CERTIFICATE OF SERVICE**

I certify that the foregoing document was filed under seal through the Court's CM/ECF system, and a copy has been provided to counsel for the government.

Respectfully Submitted,

By: /s/ Eugene V. Gorokhov

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